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Attorneys for Plaintiff Target Corporation

# UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

TARGET CORPORATION, a Minnesota corporation,	) Civil Case No. 1:15-cv-06614-LGS
Plaintiff,	)
vs.	) )
RICHRELEVANCE, INC.,	) )
a Delaware corporation,	)
Defendant.	)

### NOTICE OF MOTION FOR SUMMARY JUDGMENT

PLEASE TAKE NOTICE that upon the accompanying Statement of Undisputed Material Facts pursuant to Local Rule 56.1, dated June 29, 2016; the Declaration of David Peterson, sworn to June 29, 2016; the Declaration of Michael A. Ponto, sworn to on June 29, 2016 and the

exhibits annexed thereto; Target Corporation's Memorandum of Law, dated June 29, 2016; and upon all prior pleadings and papers filed in this action; Plaintiff Target Corporation, by its attorneys, Storch Amini & Munves PC and Faegre Baker Daniels LLP, will move this Court, before the Honorable Lorna G. Schofield, U.S. District Court, Southern District of New York, at the United States Courthouse, 40 Foley Square, New York, NY 10007 on a date and time to be determined by the Court, for an order pursuant to Fed. R. Civ. P. 56: (1) granting Target's motion for summary judgment in its entirety; (2) granting judgment to Target in the amount of \$9,250,877.26; (3) awarding Target prejudgment interest as provided for by New York law; and (4) granting such other and further relief as the Court deems just and proper.

Dated: Minneapolis, Minnesota June 29, 2016

# Respectfully submitted,

# /s/ Michael A. Ponto

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# **CERTIFICATE OF SERVICE**

I, Michael A. Ponto, hereby certify that on this 29th day of June, 2016, I caused the

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### /s/ Michael A. Ponto

Minneapolis, Minnesota June 29, 2016

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